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March 18, 2025

By ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Schiff
Criminal Docket no.: 24-CR-00605-JPO

Dear Judge Oetken:

I represent Lisa Schiff, the defendant. Sentencing is scheduled for March 19, 2025, at 11 AM. My letter addresses the Court's *Individual Practices in Criminal Cases* (the "Court's Rules, ¶1____") and more specifically, {Court's Rules, ¶18(d) through (f)} relative to my request for sealing of my client's entire Sentencing Memorandum and exhibits (collectively the "Defense Sentencing Memorandum"). I also write to address this matter as it was presented to me by the government yesterday.

I write through the lens of the guidelines provided in the *Privacy Policy* {Court's Rules, ¶18(e)} which sets forth the five categories of "sensitive information." I also look to what has been characterized as additional categories of information that "(require) caution¹" as well as the cases *United States v. Tangorra*, 542 F.Supp.2d 233 (E.D.N.Y. 2008) and *United States v. Munir*, (1:12-cr-00648-JBW ECF Document no. 36).

I will undertake to redact those portions of the Sentencing Memorandum in advance of sentencing that contain sensitive information and information requiring caution. I also respectfully request that all of the character letters made part of the Defense Sentencing Memorandum be filed under seal as (a) they contain sensitive information; (b) they contain information requiring caution and (c) the privacy of the writer should be protected.

¹ See, for example, *Individual Practices of Judge John G. Koeltl*, July 6 2022.

I thank the Court for its kind consideration.

Respectfully submitted,

/s/ Randy Zelin

cc: Cecilia Vogel, Esq. for the government
Stephanie McMahon, USPO